

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

GREGORY COLBURN et al.,

Defendants

Case No. 1:19-cr-10080-NMG

**DEFENDANT JOHN WILSON'S ASSENTED TO MOTION FOR LEAVE TO FILE  
PARTIALLY UNDER SEAL A LETTER OF REFERENCE  
RELATED TO HIS SENTENCING**

Defendant John Wilson respectfully moves this Court for leave to file one letter of reference related to his sentencing, which is an exhibit to his Sentencing Memorandum, partially under seal. The portion of the letter that Wilson seeks to seal discusses sensitive and confidential matters relating to one of his children. Accordingly, under Local Rule 7.2, Defendant asks that the Court grant leave to file the letter as a partially sealed attachment to his Sentencing Memorandum. The memorandum itself and all other letters and exhibits will be filed publicly and Wilson would publicly file a redacted version of the letter. Wilson will provide the government and Court unredacted copies of the letter.

Respectfully submitted,

*Counsel for John Wilson*

/s/ Michael Kendall

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Date February 9, 2022

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULES 7.1 AND 112.1**

The undersigned counsel hereby certifies that counsel for the Defendant has conferred with counsel for the government and attempted in good faith to resolve or narrow the issues raised by this motion. The government assents to this motion.

/s/ Michael Kendall  
Michael Kendall

**CERTIFICATE OF SERVICE**

I hereby certify that the above document is being filed on the date appearing in the header through the ECF system, which will send true copies to the attorneys of record.

/s/ Michael Kendall  
Michael Kendall